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Attorney for David S. Kurtzman and Karen M.
Kurtzman, Trustees of the Kurtzman Family
Trust, dated May 17, 1995

UNITED STATE BANKRUPTCY COURT
FOR THE DISTRICT OF NEVADA

In re:)	Case no: BK-17-50081-btb
)	Chapter: 7
)	
PATRICIA G. OLSON)	CONDITIONAL NON-OPPOSITION TO
)	DEBTOR'S MOTION TO SELL FREE AND
)	CLEAR OF LIENS UNDER SECTION 363(f)
)	
)	Hearing date: 5/18/2017
)	Hearing time: 1:30 pm
Debtor.)	

COMES NOW, David S. Kurtzman and Karen M. Kurtzman, Trustees of the Kurtzman Family Trust, dated May 17, 1995, (hereinafter "Secured Creditor") by and through its attorneys, Chris D. Nichols, of MINDEN LAWYERS, and hereby files this Conditional Non-opposition to Debtor's Motion to Sell Free and Clear of Liens Under Section 363 (f), and hereby alleges and states as follows:

1. Secured Creditor holds a second Deed of Trust on the property located at 949 Balbijou Road, South Lake Tahoe, CA 96150, which is one of the parcels of property subject to the Debtor's pending Motion to Sell Free and Clear of Liens Under Section 363 (f).

2. The Secured Creditor does not oppose the Debtor's Motion to Sell Free and Clear of Liens Under Section 363 (f), subject to the condition that Secured Creditor's Deed of Trust and all sums due and owing thereunder, will be paid in full pursuant to an updated payoff demand at the time of closing of the sales transaction.
3. Secured Creditor does not consent to any sale that does not pay its secured claim in full pursuant to an updated payoff demand as of the time of the closing of the sales transaction.

DATED this 1st day of May, 2017.

MINDEN LAWYERS, LLC

By: 

CHRIS D. NICHOLS, ESQ.

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CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), I certify that I am an employee of MINDEN LAWYERS, LLC and that on the ____ day of May, 2017, I caused a true and correct copy of the document entitled Conditional Non-Opposition to Debtor's Motion to Sell Free and Clear of Liens Under Section 363(F) to be served by:

☐ **BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED:** I deposited for mailing in the United States mail, with postage fully prepaid, an envelope containing the above-identified document at Minden, Nevada, in the ordinary course of business, addressed as follows:

☐ **BY MESSENGER SERVICE:** I delivered the above-identified document to Reno-Carson Messenger Service for delivery to the offices of the addressee.

☐ **BY FACSIMILE:** I transmitted via facsimile from the offices of Minden Lawyers, LLC, the above-identified document in the ordinary course of business. Fax No. _____.

☐ **BY HAND DELIVERY:** I hand delivered an envelope containing the above-identified document to the addressee stated above, in the ordinary course of business.

☒ BY ECF SYSTEM:

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 Mary M. Hasselmann